

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

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In re: :
: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
: :
as representative of : Case No. 17-BK-3283 (LTS)
: :
THE COMMONWEALTH OF PUERTO RICO *et* : Re: Dkt. No. 18269
al., : :
: (Jointly Administered)
Debtors.¹ X

**MOTION TO INFORM APPEARANCE OF CANTOR-KATZ COLLATERAL
MONITOR LLC AT OCTOBER 6-7, 2021 OMNIBUS HEARING**

TO THE HONORABLE COURT:

COME NOW Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company which serves as the collateral monitor for Wilmington Trust, N.A. in connection with the new bonds issued by the GDB Debt Recovery Authority (the “DRA”) pursuant to the *Government Development Bank for Puerto Rico Debt Restructuring Act*, Act No. 109-2017, as amended by Act No. 147-2018 and the approved Qualifying Modification for the Government

¹ The Debtors in these title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

Development Bank for Puerto Rico² under Title VI of the *Puerto Rico Oversight, Management and Economic Stability Act* (the “Collateral Monitor”), by and through the undersigned legal counsel, hereby submits this motion to inform (the “Informative Motion”) pursuant to this Honorable Court’s *Order Regarding Procedures For October 6-7, 2021, Omnibus Hearing* [Dkt. No. 18269] (the “Procedures Order”),³ and respectfully states as follows:

1. Taleah Jennings and/or Peter J. Amend of Schulte Roth & Zabel LLP will appear on behalf of the Collateral Monitor at the omnibus hearing (the “Hearing”), which will be conducted via Zoom in accordance with the Procedures Order. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.
2. Ms. Jennings and/or Mr. Amend may present oral argument related to the following:
 - a. *The Debtors’ Motion In Limine In Respect Of Evidence Concerning Whether The Proposed Plan of Adjustment is Consistent With The Certified Fiscal Plan* [Dkt. No. 18116];
 - b. *The DRA Parties’ Opposition to Debtors’ Motion In Limine In Respect of Evidence Concerning Whether The Proposed Plan of Adjustment Is Consistent With The Certified Fiscal Plan* [Dkt. No. 18188];
 - c. *Debtors’ Omnibus Reply In Support of Motion In Limine In Respect of Evidence Concerning Whether The Proposed Plan of Adjustment Is Consistent With The Certified Fiscal Plan* [Dkt. No. 18292]; and
 - d. Any other responses or filings related to the foregoing.
3. In addition, the Collateral Monitor reserves the right to have Douglas S. Mintz participate at the Hearing on its behalf, with the understanding that any such appearance shall be in accordance with Paragraph 1 of the Procedures Order.

² See Dkt. No. 270 of Civil Case No. 18-01561 (LTS).

³ Capitalized terms used herein and otherwise not defined shall have the meaning ascribed to such term in the Procedures Order.

4. Carmen D. Conde Torres, Esq. and Luisa S. Valle Castro, Esq. of C. Conde & Assoc., as local counsel for the Collateral Monitor, will attend the Hearing through the listen-in access lines provided by the Court.

5. Furthermore, the Collateral Monitor reserves the right to be heard and present oral argument to address any matter identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or raised by any party at the Hearing related to the Title III cases or any adversary proceeding which may affect the interests of the DRA. The Collateral Monitor reserves the right to amend this Informative Motion as needed.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 1st day of October, 2021.

WE HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system including the US Trustee and to all those parties registered to receive notice within the electronic notification service.

[Signatures on next page]

C. CONDE & ASSOC. LAW OFFICES

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Exhibit A

Party Appearance Sheet

Name of Party	Cantor-Katz Collateral Monitor LLC
Party Name Abbreviation (For Use with Zoom)	Cantor-Katz
Omnibus Hearing Participant Attorney(s) Representing Party (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none">• Name,• Email,• Law Firm,• Phone Number and• Docket Entry No. for the Attorney's Notice of Appearance	Taleah E. Jennings taleah.jennings@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 18061] -and- Peter J. Amend peter.amend@srz.com Schulte Roth & Zabel LLP (212) 756-2000 [Dkt. No. 6976] -and- Douglas S. Mintz* douglas.mintz@srz.com Schulte Roth & Zabel LLP (202) 729-7482 [Dkt. No. 6951] * The Collateral Monitor reserves the right to have Douglas Mintz appear on its behalf at the Hearing, with the understanding that said appearance shall be in accordance with Paragraph 1 of the Procedures Order.
Plan Objection Docket Entry No.	Cantor-Katz Collateral Monitor LLC is not appearing regarding a plan objection, but in connection with:

	<ul style="list-style-type: none">a. <i>The Debtors' Motion In Limine In Respect Of Evidence Concerning Whether The Proposed Plan of Adjustment is Consistent With The Certified Fiscal Plan</i> [Dkt. No. 18116];b. <i>The DRA Parties' Opposition to Debtors' Motion In Limine In Respect of Evidence Concerning Whether The Proposed Plan of Adjustment Is Consistent With The Certified Fiscal Plan</i> [Dkt. No. 18188];c. <i>Debtors' Omnibus Reply In Support of Motion In Limine In Respect of Evidence Concerning Whether The Proposed Plan of Adjustment Is Consistent With The Certified Fiscal Plan</i> [Dkt. No. 18292]; andd. Any other responses or filings related to the foregoing.
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
Note: Pursuant to the Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other party-in-interest shall be limited to 2 attorneys at any given time.	